

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION**

JOHN DOE 4, by and through his next)
friend, NELSON LOPEZ, on behalf of)
himself and all persons similarly situated)
)
Plaintiffs,)
) **Civil Action No. 5:17-cv-00097-EKD**
v.)
)
SHENANDOAH VALLEY JUVENILE)
CENTER COMMISSION,)
)
Defendant.)

**DEFENDANT'S MOTION FOR SANCTIONS UNDER
FEDERAL RULE OF CIVIL PROCEDURE 16(f)**

Defendant Shenandoah Valley Juvenile Center Commission (“SVJC”), by counsel, and pursuant to Federal Rule of Civil Procedure 16(f), respectfully moves that the Court exclude the November 7, 2018 Supplemental Expert Report prepared by Plaintiff’s expert, Dr. Paul Diver, and any testimony related thereto, as a sanction for the Plaintiff’s failure to disclose the Supplemental Expert Report in a timely manner consistent with the Scheduling Order entered by this Court on August 22, 2018.

The bases for this Motion are detailed in Defendant’s Memorandum in Support of this Motion, filed contemporaneously with this Motion.

Respectfully submitted,
SHENANDOAH VALLEY JUVENILE
CENTER COMMISSION
By Counsel

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CERTIFICATE

I certify that on the 14th day of November, 2018, I electronically filed the forgoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to:

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